

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**INTELLECTUAL VENTURES I LLC,  
ET. AL.,**

*Plaintiffs,*

**v.**

**J. CREW GROUP, INC.**

*Defendant.*

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**No. 6:16-cv-0196-JRG**

**LEAD CASE**

**Jury Trial Demanded**

**JOINT MOTION FOR ENTRY OF AGREED  
PROPOSED DOCKET CONTROL ORDER**

COME NOW Plaintiffs Intellectual Ventures I, LLC and Intellectual Ventures II, LLC as well as Defendants J. Crew Group, Inc. and FTD Companies, Inc. (collectively, “Defendants”) to file this Joint Motion for Entry of Agreed Proposed Docket Control Order and in support of same would show the Court as follows:

Plaintiffs and Defendants have reached agreement on the Docket Control Order attached hereto and request entry of the proposed Docket Control Order. To the extent that the parties have agreed to change certain deadlines in the Docket Control Order provided to the parties by the Court at the scheduling conference in this case, the changed dates are shown in the attached proposed Docket Control Order.

Two of the proposed changes affect dates requiring good cause to change. As good cause, the parties state as follows:

- **File Dispositive Motions or Motions to Strike Expert Testimony (including Daubert Motions).** The parties seek a short extension of this deadline so as to build in a week between the close of expert discovery and the filing of motions which may be related to that discovery. The parties moved the deadline for completing expert discovery by agreement to July 11 because the previous deadline was set for July 4, a Tuesday, and

the parties expect expert witnesses may be unavailable during this week. This brief extension of the deadline to file dispositive motions or motions to strike will permit the parties an opportunity to evaluate the entirety of expert discovery before concluding whether dispositive motions or motions to strike are necessary, and avoids any potential for key discovery occurring the same day as a motion to strike such discovery may be due.

- **Comply with Paragraphs 1 & 3 of the Discovery Order (Initial and Additional Disclosures).** Given the lengthy interim period before the claim construction deadlines, the parties believe that they will be able to more thoroughly investigate their responsive files and witnesses if they are provided an additional two weeks. This will permit all parties to provide more meaningful initial disclosures. All parties agree that no party will suffer any meaningful prejudice by moving this deadline back two weeks.

Accordingly, the parties respectfully request entry of the proposed docket control order attached as Exhibit A.

WHEREFORE, Plaintiffs and Defendant jointly and respectfully request that the Court enter the proposed Docket Control Order to govern this case.

Dated: July 14, 2016

Respectfully submitted,

/s Jason Blackstone

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**CERTIFICATE OF CONFERENCE**

I hereby certify that Jason Blackstone, counsel for Plaintiffs, as well as Stacy Stitham, and Brady Cox, counsel for Defendants, met and conferred regarding the relief requested in this Motion on July 14, 2016. The parties join in seeking the relief sought in this Motion.

/s Jason Blackstone

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**Jason Blackstone**

**CERTIFICATE OF  
SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been delivered to all counsel of record via the Court's CM/ECF service on this 14<sup>th</sup> day of July, 2016.

/s Jason Blackstone

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**Jason Blackstone**